

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Harrisonburg**

RLI INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 5:18cv00066-MFU-JCH
)	
NEXUS SERVICES, INC.,)	
LIBRE BY NEXUS, INC.,)	
HOMES BY NEXUS, INC.,)	
)	
Defendants.)	
_____)	

RLI'S RESPONSE TO SPECIAL MASTER'S REPORT

RLI Insurance agrees with the recommendation of the Special Master that the appointment of a receiver is necessary to facilitate the post-judgment information and collection efforts of RLI due to the ongoing noncompliance of Nexus. RLI further states that it does not challenge any of the conclusions of fact or law in the Special Master's Report and hereby incorporates by reference the arguments it raised in its position paper, which is attached as Exhibit 3 to the Special Master's Report. Dkt. No 891-3. RLI appreciates the efforts of the Special Master to attempt to obtain the Court-ordered documents and information and agrees with the Special Master's assessment that further involvement by the Special Master would be futile given Nexus' conduct to date. Accordingly, RLI respectfully requests that a receiver be appointed for the Nexus Defendants consistent with the prior proposed Order submitted by RLI in June of 2023. *See* Dkt. No. 852. In addition to that already set out in its proposed Order, RLI further asks that any receiver Order specifically grant the receiver access to all communications, documents, and any other materials or information between the Nexus Defendants and

Subversivo LLC such that the receiver has sufficient information to report on the relationship between the Nexus Defendants and Subversivo and can advise the Court and RLI about any and all financial transactions and conduct engaged in by Subersivo on behalf of or related to the Nexus Defendants.

Dated: March 25, 2024

RLI INSURANCE COMPANY

/s/_____

Jennifer L. Eaton (VSB No.: 87491)
Woods Rogers Vandeventer Black PLC
101 W. Main Street, Suite 500
Norfolk, VA 23510
Phone: 757-446-8600
Facsimile: 757-446-8670
Jennifer.Eaton@wryblaw.com
Attorney for Plaintiff RLI Insurance Company